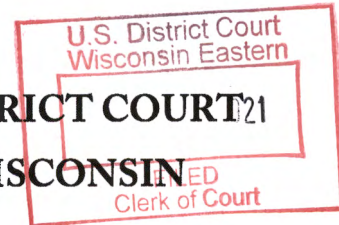


IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN



SAMANTHA PLETCHER; and ADAM
PLETCHER

Plaintiffs,

vs.

SPARKPLUG CAPITAL LLC, a Delaware
Limited-Liability Company.

Defendant.

) Case No: 20-cv-00811

) **PLAINTIFF'S LAY & EXPERT**
) **WITNESS LIST**

Plaintiffs, hereby reserve the right to call the following lay and witnesses to testify
at the time of trial:

LAY WITNESSES

1. Samantha Pletcher, plaintiff in this action. Mrs. Pletcher has been
deposed in this action.
2. Adam Pletcher, plaintiff in this action. Mr. Pletcher has been deposed in
this action.
3. Ross Morri - 30(b)6 designee for Trac-Rite Door, LLC. Mr. Morri has
been deposed in this action. It is anticipated that he will testify
consistent with his deposition testimony on the subjects inquired.
4. Robert Monahan, Esq. - former attorney retained by Samantha Pletcher
in June 2017 after the alleged accident. To date, Mr. Monahan has not

been deposed but is expected to testify regarding his involvement as retained counsel including his communications with Defendant as well as his efforts to notify defendant's insurance provider of the accident which occurred on the property covered by such insurance provider. Mr. Monahan's last known business address is 4229 Grove Ave., Gurnee, IL 60031 and his phone number is (847) 848-6165

5. Representatives, past employees, and present employees of Defendant, including, but not limited to, the following individuals may be called to render testimony at trial.
 - a. Kurt Bottlemy –Facility Supervisor. Mr. Bottlemy has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his role in his capacity as a Facility Supervisor and topics such as maintenance procedures and processes.
 - b. Robert Vanderploeg - Director of Field Operations. Mr. Vanderploeg has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his role in his capacity as Director of Field Operations and topics such as maintenance procedures and processes.

- c. Chad Lewis - 30(b)6 designee and Vice President of Operations. Mr. Lewis has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his role in his capacity as Vice President of Operations and topics such as Sparkplug's corporate structure.
 - d. Jen Keane - Director of Asset Management. Ms. Keane has been deposed in this action. It is anticipated that she will testify consistent with her deposition testimony on the subjects inquired. She is further expected to testify regarding her role in her capacity as Director of Asset Management and topics such as Sparkplug's corporate structure and acquisitions.
 - e. Seth Bent -- Previously CEO. Mr. Bent has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his role when he was the CEO and topics such as creating Sparkplug and processes and procedures of acquisitions.
6. Molly Coyle -- Owner of 1900 A.D., LLC. Ms. Coyle has been deposed in this action. It is anticipated that she will testify consistent with her deposition testimony on the subjects inquired. She is further expected to

testify regarding 1900 A.D., LLC's maintenance processes and procedures when it owned the subject storage facility.

7. Tanner Hughes – Owner of Hughes Property Services, LLC. Mr. Hughes has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his experience in maintenance and repair of garage doors, including spring repair.
8. Damon Kaplanek - Owner, Damon Doors & Loading Dock Equipment, LLC. Mr. Kaplanek has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify regarding his experience in maintenance & repair of garage doors, including spring repair.

NON-RETAINED EXPERT WITNESSES


9. Dr. Dana Pletcher, D.C. Chiropractic Physician and owner of HealthQuest Longevity Center in Libertyville, Illinois. Dr. Pletcher has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify as a non-retained expert witness in his treating physician capacity regarding his observation, diagnosis,

prognosis, evaluation and treatment as well as anticipated ongoing treatment & prognosis of plaintiff, Samantha Pletcher.

10. Dr. Jeffrey J. Watkin, D.C. Chiropractic Physician and associate doctor of HealthQuest Longevity Center in Libertyville, Illinois. Dr. Watkin has been deposed in this action. It is anticipated that he will testify consistent with his deposition testimony on the subjects inquired. He is further expected to testify as a non-retained expert witness in his treating physician capacity regarding his observation, diagnosis, prognosis, evaluation and treatment as well as anticipated ongoing treatment & prognosis of plaintiff, Samantha Pletcher.
11. Any and all witnesses necessary to offer rebuttal testimony.
12. Plaintiffs expressly reserve the right to supplement and/or amend this Lay and Expert Witness List up to and during the trial of this action based on further discovery and pursuant to testimony that may be introduced at trial.

Respectfully submitted,

Dated: June 8, 2021

By: 
Adam & Samantha Pletcher
Plaintiffs